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PAGE 1 / 2

September 23, 2015

VIA ELECTRONIC FILING
Federal Election Commission
Attention: Christopher Morse
Campaign Finance Analyst
Reports Analysis Division
999 E Street, NW
Washington, DC 20463

Dear Mr. Morse:

Advancing Freedom Fund is in receipt of your Request for Additional Information (RAI) dated August 24, 2015, regarding the Mid-Year Report (01/01/2015 - 06/30/2015). Specifically, this statement provides information in response to your request for information regarding: 1) the identification of all individuals in the Mid-Year Report who contributed in excess of \$200 in a calendar year pursuant to 11 CFR 104.3(a)(4)(i), and whether such identification complies with 11 CFR 100.12 by providing the full name, complete mailing address, occupation, and name of employer ('identification information'); and, 2) Advancing Freedom Fund's compliance with the 'best efforts' standard, established under 11 CFR 104.7, et seq., for the collection of such identification information.

Contemporaneously with the filing of this statement, Advancing Freedom Fund has filed an amended Mid-Year Report. The amended report updates the identification information, including the occupation and employer information, for several contributors. (This amended Mid-Year Report also increases the amount of itemized receipts from \$16888 to \$21303; this increase is due to the aggregation of contributor records once additional information was received via responses from contributors responding to Advancing Freedom Fund's follow up requests (discussed below) for identification information.)

As you are likely aware, contributors do not always provide the needed identification information, and in some cases, contributors refuse to provide identification information. Advancing Freedom Fund has established a policy and procedure for the collection of identification information consistent with related laws, rules and regulations. This policy is not only followed by Advancing Freedom Fund, but Advancing Freedom Fund requires its fundraising vendors to follow this policy as well. The policy is as follows:

All solicitations include a clear and conspicuous request for the identification information, and the initial request (whether in writing or via telephone) informs the contributor of Advancing Freedom Fund's obligation to use its best efforts to collect the identification information.

If the contributor does not provide the requested information in the initial request, within thirty (30) days of the contribution, Advancing Freedom Fund makes a follow up phone call (or sends a follow up correspondence with a pre-address response envelop) and asks again for the identification information. The follow up request again informs the contributor of the requirements of federal law for the reporting of such identification information, and of Advancing Freedom Fund's obligation to use best efforts to collect the contribution information.

When preparing Form 3X: Report of Receipts and Disbursements (report), it is Advancing Freedom Fund's practice to include all related (disbursement and) receipts records received during the reporting period - whether or not the record is missing identification information. If a contribution record is missing identification information, and efforts are underway to follow up and collect the missing identification information, the field with the missing identification information is populated with a phrase that indicates the use of best efforts to obtain the information, e.g. Best Efforts Attempted.

A-G7 9 @5 B9CI G'H9LH'fl 97 : cfa ' - - L

PAGE 2 / 2

If the requested information is received after the related contribution has been reported, Advancing Freedom Fund amends the report originally disclosing the contribution to provide such identification information.

It is my hope this statement provides an adequate explanation for issues outlined in your RFAI. Of course, please do not hesitate to contac
